

FILED

JAN 28 2020

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIACLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

UNITED STATES OF AMERICA)

v.)

COREY P. POLLARD)
KIRK L. PRICE)Criminal No. 20-29
UNDER SEAL
(18 U.S.C. §§ 2, 371, and 2312)INDICTMENTCOUNT ONE

The grand jury charges:

THE CONSPIRACY AND ITS OBJECTS

From in or around November, 2019, to on or about January 21, 2020, in the Western District of Pennsylvania and elsewhere, defendants COREY P. POLLARD and KIRK L. PRICE did knowingly and willfully conspire and agree, together and with each other, and with other persons known and unknown to the grand jury, to commit offenses against the United States, namely, Interstate Transportation of Stolen Motor Vehicles, in violation of Title 18, United States Code, Section 2312, and Interstate Transportation of Stolen Property, in violation of Title 18, United States Code, Section 2314.

MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy that defendants COREY P. POLLARD and KIRK L. PRICE, and other persons known and unknown to the grand jury, agreed that they would travel to various locations in Pennsylvania and Delaware in order to steal and then transport stolen motor vehicles to Maryland, and to steal and then transport to Maryland other stolen property items valued in excess of \$5,000.

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AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

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cc 2 - 10/250/3pm S.R.

OVERT ACTS

In furtherance of the conspiracy, and to effect the objects of the conspiracy, defendants COREY P. POLLARD and KIRK L. PRICE, and other persons known and unknown to the grand jury, committed the following overt acts in the Western District of Pennsylvania and elsewhere:

1. On or about November 24, 2019, at least five members of the conspiracy traveled to a vehicle dealership in Moon Township, PA, where the following overt acts were committed by the conspirators:

- (a) a 2018 Jeep Cherokee Trackhawk, bearing VIN ending in 4414, was stolen;
- (b) a 2019 Ram 1500, bearing VIN ending in 7845, was stolen;
- (c) a 2018 Ram 3500, bearing VIN ending in 6730, was stolen;
- (d) a 2020 Ram 1500, bearing VIN ending in 5683, was stolen; and
- (e) an Infiniti automobile, registered to defendant KIRK L. PRICE, was driven away from the dealership in Moon Township, PA, along with the four above-referenced stolen vehicles.

2. On or about December 5, 2019, at least two members of the conspiracy traveled to a Verizon cell phone store located in Suburban Plaza in or around Newark, Delaware, where the following overt acts were committed by the conspirators:

- (a) a sledgehammer was used to break a glass door to the Verizon cell phone store;
- (b) approximately thirty-nine cell phones with a value of approximately \$22,483 were stolen;
- (c) the 2019 Ram 1500 described in paragraph 1(b) above was used by conspirators to make a getaway from the Verizon cell phone store; and

(d) A Maserati automobile belonging to defendant COREY P. POLLARD was used by at least one conspirator to make a getaway from the Verizon cell phone store.

3. On or about December 15, 2019, at least three members of the conspiracy traveled to a vehicle dealership located in Quarryville, PA, where the following overt acts were committed by the conspirators;

- (a) a 2020 Ford F-150 Raptor, bearing VIN ending in 4523, was stolen;
- (b) a 2020 Ford F-350, bearing VIN ending in 8772 was stolen; and
- (c) an Audi SUV, which had been rented by defendant COREY P. POLLARD, was driven away from the dealership in Quarryville, PA, along with the two above-referenced stolen vehicles.

4. On or about December 23, 2019, at least six members of the conspiracy traveled to a vehicle dealership in or around Wayne, PA, where the following overt acts were committed by the conspirators:

- (a) a 2020 Range Rover Sport, bearing VIN ending with 9237, was stolen;
- (b) a 2020 Range Rover, bearing VIN ending in 2211, was stolen;
- (c) a 2016 Range Rover Sport, bearing VIN ending in 9276, was stolen;
- (d) a 2017 Range Rover Sport, bearing VIN ending in 2495, was stolen;
- (e) a 2016 Range Rover HSE, bearing VIN ending in 5908, was stolen; and
- (f) a 2017 Ranger Rover HSE, bearing VIN ending in 1742, was stolen.

5. On or about December 30, 2019, at least two members of the conspiracy traveled again to the above-described Verizon cell phone store in Suburban Plaza, in or around Newark, Delaware, where the following overt acts were committed by the conspirators:

(a) a sledgehammer was used to break a glass door to the Verizon cell phone store; and

(b) cell phones and tablets, with an approximate value of \$13,269, were stolen.

6. On or about December 30, 2019, at least two members of the conspiracy traveled to a Verizon cell phone store in or around Chestnut Hill Road in Newark, Delaware, where the following overt acts were committed by the conspirators:

(a) a sledgehammer was used to break the glass door to the Verizon cell phone store; and

(b) the conspirators entered the Verizon cell phone store.

In violation of Title 18, United States Code, Section 371.

COUNT TWO

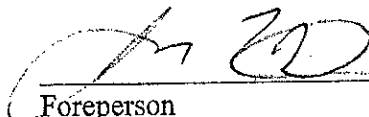
The grand jury further charges:

On or about November 24, 2019, in the Western District of Pennsylvania, and elsewhere, defendant COREY P. POLLARD and KIRK L. PRICE did unlawfully transport and cause to be transported, in interstate commerce, from the Western District of Pennsylvania to locations in the State of Maryland, stolen motor vehicles, knowing the same to have been stolen, namely:


- (a) a 2018 Jeep Cherokee Trackhawk, bearing VIN ending in 4414;
- (b) a 2019 Dodge Ram 1500, bearing VIN ending in 7845;
- (c) a 2018 Dodge Ram 3500, bearing VIN ending in 6730; and
- (d) a 2020 Dodge Ram 1500, bearing VIN ending in 5683.

In violation of Title 18, United States Code, Sections 2 and 2312.

A True Bill,



Foreperson



SCOTT W. BRADY
United States Attorney
PA ID No. 88352